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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

July 24, 2017

Re: GN Docket No. 12-354

To Whom It May Concern:

We are writing on behalf of Ohio rural fixed wireless providers to express our opposition to the petitions filed by CTIA and T-Mobile regarding proposed changes to the Citizens Broadband Radio Service (CBRS) band.

The FCC adopted rules in 2015 to establish the CBRS band. The band employs a three-tier spectrum access model, including *Incumbent Access*, *Priority Access* and *General Authorized Access*. The FCC allocated up to 70 megahertz for Priority Access Licenses (PALS) and the remaining 80 megahertz for General Authorized (GAA) use. The model will be governed by a Spectrum Access System (SAS) that will enforce the three-tier approach.

The mobile industry wants to change the rules so they are friendlier to 5G services that they are developing. In our view, the effect of these fundamental changes will effectively foreclose other uses and create a "5G-only" band. These changes will convert the "innovation band" the FCC envisioned into a 5G-only band that will be unavailable to WISPs and other small companies that would not have the means to overbid large mobile carriers for licenses that would cost much more. Pricing out many small would-be bidders would essentially ensure that the large mobile wireless carriers have exclusive access to the spectrum. Smaller providers, even if they had the means to outbid the large carriers, would be forced to acquire large-area licenses in multiple counties that are likely much larger than the targeted areas WISPs would want to serve.

As you know, the Wireless Internet Service Providers Association (WISPA) fought very hard and successfully to urge the FCC to adopt favorable rules, and if these changes proposed by CTIA and T-Mobile were adopted, they would severely limit the benefits that were created for rural broadband deployment.

As small fixed wireless providers in rural Ohio, we are adamantly opposed to the petitions filed by CTIA and T-Mobile. If adopted, the mobile industry's proposals would undermine existing investment in 3650-3700 MHz and inhibit further investment and deployment in the entire 150 Megahertz of spectrum. We urge you to strike these petitions and allow us the opportunity to provide these services and move forward expeditiously with the already agreed up innovation band. Customers need to have the choice of providers and the providers need to have the ability to affordably offer competitive services to enhance the broadband internet experience in rural America.

Sincerely,

/s/ Phillip D. Maag

Phillip D. Maag, President
MetaLINK Technologies, Inc.